

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

March 14, 2022

PERMIT TO INSTALL
143-04D

ISSUED TO
SprayTek, Inc.

LOCATED AT
2535 Wolcott
Ferndale, Michigan 48220

IN THE COUNTY OF
Oakland

STATE REGISTRATION NUMBER
N0917

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: January 12, 2022	
DATE PERMIT TO INSTALL APPROVED: March 14, 2022	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS 2
POLLUTANT / MEASUREMENT ABBREVIATIONS..... 3
GENERAL CONDITIONS 4
EMISSION UNIT SPECIAL CONDITIONS..... 6
FLEXIBLE GROUP SPECIAL CONDITIONS..... 7
 FLEXIBLE GROUP SUMMARY TABLE 7
 FGRULE621 8
FGFACILITY CONDITIONS..... 12

COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EULINE1	Chain on edge coating line with associated curing oven. The spray booth is equipped with dry filters.	9/1/2004	FGRULE621
EULINE2	Dip-spin coating system with convection oven.	8/26/2004	FGRULE621
EUWASHLINE	A metal parts processing line consisting of a series of eight pretreatment stages, two downdraft coating booths the associated curing ovens, and dry filters.	12/1/2005	FGRULE621
EUNUMBER8	Dip-spin coating line consisting of a hopper, dip-spin booth, conveyor, oven, and cooldown.	12/30/2016	FGRULE621
EUBATCH1	Spray booth used to coat miscellaneous metal parts.	9/1/2004 / Date of PTI Issuance	FGRULE621
EUBATCH2	Spray booth used to coat miscellaneous metal parts.	9/6/2005 / Date of PTI Issuance	FGRULE621
EUBATCHJR	Spray booth used to coat miscellaneous metal parts.	9/26/2005 / Date of PTI Issuance	FGRULE621
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGRULE621	All metal parts coating lines source-wide, including metal parts coating lines covered by other permits, which are exempted by R 336.1621(10)(b).	EULINE1, EULINE2, EUWASHLINE, EUNUMBER8, EUBATCH1, EUBATCH2, EUBATCHJR

**FGRULE621
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

All metal parts coating lines source-wide, including metal parts coating lines covered by other permits, which are exempted by R 336.1621(10)(b).

Emission Unit: EULINE1, EULINE2, EUWASHLINE, EUNUMBER8, EUBATCH1, EUBATCH2, EUBATCHJR

POLLUTION CONTROL EQUIPMENT

Dry filters to control particulate matter

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	10.0 tpy	12-month rolling time period as determined at the end of each calendar month.	each individual Emission Unit in FGRULE621	SC VI.3	R 336.1702(d)
2. VOCs	2000 pounds per month	Calendar Month	each individual Emission Unit in FGRULE621	SC VI.3	R 336.1702(d)
3. VOCs	30.0 tpy	12-month rolling time period as determined at the end of each calendar month.	FGRULE621	SC VI.4	R 336.1702(d)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1225, R 336.1702(d))**
2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air, implementing the procedures for minimizing emissions as described in Appendix A. **(R 336.1224, R 336.1370(1), R 336.1901)**
3. The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions, implementing the procedures for minimizing emissions as described in Appendix A. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1205(3), R 336.1225, R 336.1702(d) , R 336.1901)**
4. The permittee shall maintain and operate FGCOATING according to the procedures outlined in the Fugitive VOC Emissions and Odor Control Plan attached as Appendix A. **(R 336.1702, R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the spray booth portions of FGRULE621 unless the respective exhaust filters are installed, maintained and operated in a satisfactory manner. **(R 336.1224, R 336.1301)**
2. The permittee shall equip and maintain EULINE1, EUWASHLINE, EUBATCH1, EUBATCH2, and EUBATCHJR with HVLP or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. The permittee shall use the HVLP test cap(s) once per calendar month to verify that the pressure from each applicator does not exceed 10 psig or the psig established in a demonstration. If 10 psig is exceeded, the permittee shall reduce the applicator pressure to less than or equal to 10 psig, or the permittee shall demonstrate and document an equivalent HVLP transfer efficiency. **(R 336.1702(d))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. **(R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, R 336.1225, R 336.1702)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702)**
3. The permittee shall keep the following information on a calendar month basis for each individual emission unit under FGRULE621:
 - a) Gallons (with water) or pounds of each coating used and/or reclaimed.
 - b) VOC content (with water) of each coating as applied.
 - c) VOC mass emission calculations determining the monthly emission rate in pounds per calendar month.
 - d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1702(d))**

4. The permittee shall keep the following information on a calendar month basis for all metal parts coating lines source-wide, including metal parts coating lines covered by other permits, which are exempted by R 336.1621(10)(b):
 - a) Gallons (with water) or pounds of each coating used and/or reclaimed.
 - b) VOC content (with water) of each coating as applied.
 - c) VOC mass emission calculations determining the monthly emission rate in pounds per calendar month.
 - d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1702(d))**

5. The permittee shall keep filter inspection and replacement records on a monthly basis using a method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1910)**
6. The permittee shall keep pressure test records on a monthly basis as required in SCIV.2 using a method and format acceptable to the AQD District Supervisor. If required, the permittee shall keep a demonstration of HVLP equivalent transfer efficiency. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1702(d))**

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification of EUBATCH1, EUBATCH2, and EUBATCHJR authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of FG-RTO. **(R 336.1201(7)(a))**

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV01 (EULINE1)	24	30	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV02 (EULINE1)	14	30	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV03 (EULINE1)	10	30	R 336.1225, 40 CFR 52.21(c) & (d)
4. SV04 (EULINE2)	10	30	R 336.1225, 40 CFR 52.21(c) & (d)
5. SV05 (EULINE2)	10	30	R 336.1225, 40 CFR 52.21(c) & (d)
6. SV06 (EUWASHLINE)	36	30	R 336.1225, 40 CFR 52.21(c) & (d)
7. SV07 (EUWASHLINE)	36	30	R 336.1225, 40 CFR 52.21(c) & (d)
8. SV08 (EUWASHLINE)	36	30	R 336.1225, 40 CFR 52.21(c) & (d)
9. SV09 (EUNUMBER8)	12	42	R 336.1225, 40 CFR 52.21(c) & (d)
10. SV10 (EUNUMBER8)	10	42	R 336.1225, 40 CFR 52.21(c) & (d)
11. SV11 (EUNUMBER8)	10	42	R 336.1225, 40 CFR 52.21(c) & (d)
12. SVBATCH1 (EUBATCH1)	36	41.6	R 336.1225, 40 CFR 52.21(c) & (d)
13. SVBATCH2 (EUBATCH2)	36	47	R 336.1225, 40 CFR 52.21(c) & (d)
14. SVBATCHJR (EUBACHJR)	19	45	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

N/A

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

FGFACILITY CONDITIONS

DESCRIPTION: The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
2. Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall determine the HAP content of any coating as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. **(R 336.1205(3))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(3))**
2. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - a) Gallons or pounds of each HAP containing material used.
 - b) Where applicable, gallons or pounds of each HAP containing material reclaimed.
 - c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.

- d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
- e) Individual and aggregate HAP emission calculations determining the cumulative emission rate of each during the first 12-months and the annual emission rate of each thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

Appendix A Fugitive VOC Emissions and Odor Control Plan

PURPOSE: This plan provides emission and odor control strategies for the areas adjacent to and associated operations involved in the storage, mixing, transportation, application, clean up, and disposal of coating and solvent materials.

1. MATERIAL STORAGE.
 - a) All coating materials and solvents shall be stored in closed containers.
 - b) Containers shall be sealed in a manner which minimizes the emission of VOCs and odors.
2. MATERIAL MIXING
 - a) Mixing containers shall be covered in a manner that minimizes the emission of fugitive emissions and odors.
 - b) All containers used in the mixing process shall be sealed in a manner which minimizes the emission of VOCs and odors except when materials are being added or removed from the container.
3. MATERIAL TRANSPORTATION
 - a) Material containers shall be covered in a manner that minimizes the emission of fugitive emissions and odors during transportation.
4. MATERIAL APPLICATION
 - a) Material containers shall be covered in a manner that minimizes the emission of fugitive emissions and odors during the application process.
 - b) For HVLP (High Volume Low Pressure) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig) per SC IV.2, verified through monthly pressure tests.
 - c) Spray exhaust filters shall be routinely inspected and maintained in a manner which minimizes the escape of fugitive emissions from each coating process.
 - d) Application of spray coatings shall be performed in a manner that maximizes the capture and control of VOC and particulate materials by each coating line exhaust system and minimizes fugitive emissions.
5. CLEAN UP
 - a) Clean up solvents shall be kept in sealed containers except when in use.
 - b) Waste coatings and/or solvents shall be kept in sealed containers.
 - c) Solvent rags shall be kept in sealed containers.
6. DISPOSAL
 - a) Drums shall be tightly sealed when being readied for disposal.
 - b) Pails, buckets and cans shall either be tightly sealed or placed in impermeable trash bags in which air has been squeezed out before tying closed.
 - c) All waste materials containing coatings and/or solvents (e.g. used filters, used rags, etc.) shall be placed in impermeable trash bags in which air has been squeezed out before tying closed.
7. TRAINING
 - a) All existing employees shall be trained on VOC emission and odor control procedures within 30 days of the issuance of this permit.
 - b) All new employees shall be trained on VOC emission and odor control procedures upon the first day of employment.
 - c) All employees shall be retrained on VOC emission and odor control procedures at a minimum of once per 12-months.
 - d) All VOC emission and odor control procedure training shall be documented in a manner satisfactory to the Air Quality Division Southeast Michigan District Supervisor.

The provisions and procedures of this plan are subject to adjustment by written notification from the AQD if, following an inspection, the AQD finds the fugitive VOC emissions and odor control procedures to be inadequate.